MALCOLM PIRNIE

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

NJD002171192

316

Peerless Tube
Site Name

Site ID Number

58-76 Locust Street
Address

Bloomfield, Essex Co., NJ
City, State

Date of Off-Site Reconnaissance April 23, 1986

SITE DESCRIPTION

Peerless Tube manufactures aerosol cans and is located in a residential area. The site is surrounded by paved parking lots and streets. In April, 1985, dumping of laquers and thinners in a pit behind the plant was reported. Inspections by the NJDEP and the Bloomfield Health Dept. at the time found no evidence of dumping.
The plant has a NJPDES permit to discharge wastewater to Lloyd's and Wigwam Brooks and to the Passaic River. Compliance evaluation inspections by NJDEP/DWR in 1984, 1985 and 1986 resulted in "acceptable" ratings.
Occupational health hazards have existed at the plant due to the use of chlorinated and aromatic hydrocarbons in the aerosol can manufacturing process. Between 1980 and 1984, the company was cited for numerous noise and safety violations.
In June, 1984, a trichloroethylene reclaiming system was installed.

PRIORITY FOR FURTHER ACTION: High ____ Medium _X_ Low ____ None ____

RECOMMENDATIONS

No further action is recommended at this site. No evidence was found of the alleged dumping, and the case was subsequently closed. Although occupational health hazards have been present at the site, OSHA is involved and is monitoring the situation.

Prepared by: Teresa M. Kennel **Date:** April 29, 1986

Of: Malcolm Pirnie, Inc.

248875

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION
01 STATE: NJ | 02 SITE NUMBER: 316

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
Peerless Tube	58-76 Locust Street

03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG. DIST.
Bloomfield	NJ	07003	Essex		

09 COORDINATES LATITUDE	LONGITUDE	BLOCK	LOT
40-47-09.0	74-12-06.0	129 (152)	60,70 (8,10)

10 DIRECTIONS TO SITE (Starting from nearest public road): Garden State Parkway to Bloomfield exit. John F. Kennedy Drive to Locust Avenue, make right.

III. RESPONSIBLE PARTIES

01 OWNER (If known)	02 STREET (Business, mailing, residential)
Peerless Tube Co.	58 Locust Avenue

03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Bloomfield	NJ	07003	( )

07 OPERATOR (If known and different from owner)	08 STREET (Business, mailing, residential)
Richard Potts, V.P.	58 Locust Avenue

09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
Bloomfield	NJ	07003	(201)743-5100.

13 TYPE OF OWNERSHIP (Check one)
[X] A. PRIVATE [ ] B. FEDERAL _____ (Agency name) [ ] C. STATE [ ] D. COUNTY [ ] E. MUNICIPAL
[ ] F. OTHER _____ (Specify) [ ] G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)
[ ] A. RCRA 3001 DATE RECEIVED: ___ MONTH DAY YEAR [ ] B. UNCONTROLLED WASTE (CERCLA 103c) DATE RECEIVED: ___ MONTH DAY YEAR [X] C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
[X] YES DATE 07-11-85 MONTH DAY YEAR [ ] NO
BY (Check all that apply)
[ ] A. EPA [ ] B. EPA CONTRACTOR [X] C. STATE [ ] D. OTHER CONTRACTOR
[ ] E. LOCAL HEALTH OFFICIAL [ ] F. OTHER _____ (Specify)
CONTRACTOR NAME (S) _____

02 SITE STATUS (Check one)
[X] A. ACTIVE [ ] B. INACTIVE [ ] C. UNKNOWN

03 YEARS OF OPERATION
BEGINNING YEAR _____ ENDING YEAR _____ [X] UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Lacquers and thinners are used on site. Substances identified include alkanes, chlorinated alkanes, aromatic hydrocarbons, butyl alcohol, 2-ethoxyethyl acetate, 2-butoxyethanol, and glycol ethers. (Attachment B)

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
Dumping of lacquers and thinners on-site was alleged but no evidence of such dumping was found. The use of aromatic and chlorinated hydrocarbons has caused occupational hazards.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)
[ ] A. HIGH (Inspection required promptly) [X] B. MEDIUM (Inspection required) [ ] C. LOW (Inspection on time available basis) [ ] D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NUMBER
Robert Hayton	NJDEP - HSMA, BEERA	(609)-6332219

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Teresa M. Kennel		M. Pirnie, Inc	(201-8450400	04-29-86 MONTH DAY YEAR

EPA FORM 2070-12 (7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
NJ	316

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- [ ] A. SOLID
- [ ] B. POWDER, FINES
- [x] C. SLUDGE
- [ ] D. OTHER _____ *(Specify)*
- [ ] E. SLURRY
- [x] F. LIQUID
- [x] G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*

TONS: Unknown
CUBIC YARDS: Unknown
NO. OF DRUMS: Unknown

03 WASTE CHARACTERISTICS *(Check all that apply)*

- [x] A. TOXIC
- [ ] B. CORROSIVE
- [ ] C. RADIOACTIVE
- [ ] D. PERSISTENT
- [ ] E. SOLUBLE
- [ ] F. INFECTIOUS
- [x] G. FLAMMABLE
- [ ] H. IGNITABLE
- [ ] I. HIGHLY VOLATILE
- [ ] J. EXPLOSIVE
- [ ] K. REACTIVE
- [ ] L. INCOMPATIBLE
- [ ] M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	Unknown		
OLW	OILY WASTE	Unknown		
SOL	SOLVENTS	Unknown		
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS	Unknown		
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
OCC	alkanes	999			
OCC	chlorinated alkanes	999			
OCC	aromatic hydrocarbons	999			
OCC	butyl alcohol	71-36-3			
OCC	2-ethoxyethyl acetate	111-15-9			
OCC	2-butoxyethanol	111-76-2			
SOL	cellosolve solvent	110-80-5			
SLU	paint sludge	999			
OLW	waste oil	999			
	(Attachments B,C)				

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references, e.g. state files, sample analysis, reports)*

Bloomfield Health Dept. files; NJDEP/DWR, DWM files; USEPA files : Attachments A-D

EPA FORM 2070-12(7-81)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
NJ	316

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 [X] A. GROUNDWATER CONTAMINATION — 02 [ ] OBSERVED (DATE:) — [X] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: — 04 NARRATIVE DESCRIPTION
The potential exists due to the alleged dumping of lacquers and thinners on-site, but no evidence of dumping was found. (Attachment D)

01 [X] B. SURFACE WATER CONTAMINATION — 02 [ ] OBSERVED (DATE:) — [X] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: — 04 NARRATIVE DESCRIPTION
The potential exists due discharges to Lloyd's and Wigwam Brooks, but the plant is in compliance with it's NJPDES permit. (Attachments A,C)

01 [X] C. CONTAMINATION OF AIR — 02 [X] OBSERVED (DATE: 04-23-86) — [ ] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: — 04 NARRATIVE DESCRIPTION
Detected odor in air during OSR.

01 [ ] D. FIRE/EXPLOSIVE CONDITIONS — 02 [ ] OBSERVED (DATE:) — [ ] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: — 04 NARRATIVE DESCRIPTION

01 [ ] E. DIRECT CONTACT — 02 [ ] OBSERVED (DATE:) — [ ] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: — 04 NARRATIVE DESCRIPTION

01 [X] F. CONTAMINATION OF SOIL — 02 [ ] OBSERVED (DATE:) — [ ] POTENTIAL — [X] ALLEGED
03 AREA POTENTIALLY AFFECTED: (Acres) — 04 NARRATIVE DESCRIPTION
Illegal dumping of lacquers and thinners was alleged, but inspections by NJDEP and the Bloomfield Health Dept. revealed no evidence of dumping. (Attachment D)

01 [ ] G. DRINKING WATER CONTAMINATION — 02 [ ] OBSERVED (DATE:) — [ ] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: — 04 NARRATIVE DESCRIPTION

01 [X] H. WORKER EXPOSURE/INJURY — 02 [X] OBSERVED (DATE: 1984) — [ ] POTENTIAL — [ ] ALLEGED
03 WORKERS POTENTIALLY AFFECTED: — 04 NARRATIVE DESCRIPTION
The Bloomfield Health Dept. determined that workers were exposed to hazardous levels of glycol ethers and chlorinated and aromatic hydrocarbons. OSHA is involved in this problem. (Attachment B)

01 [ ] I. POPULATION EXPOSURE/INJURY — 02 [ ] OBSERVED (DATE:) — [ ] POTENTIAL — [ ] ALLEGED
03 POPULATION POTENTIALLY AFFECTED: — 04 NARRATIVE DESCRIPTION

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE: NJ	02 SITE NUMBER: 316

II. HAZARDOUS CONDITIONS AND INCIDENTS *(Continued)*

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION *(Include name(s) of species)*

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES *(Spills/runoff/standing liquids/leaking drums)* — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____
04 NARRATIVE DESCRIPTION

01 ☐ N. DAMAGE TO OFFSITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

01 ☒ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☒ ALLEGED
04 NARRATIVE DESCRIPTION

Illegal dumping of lacquers and thinners was alleged, but no evidence of dumping was found during inspections by NJDEP and the Bloomfield Health Dept. (Attachment D)

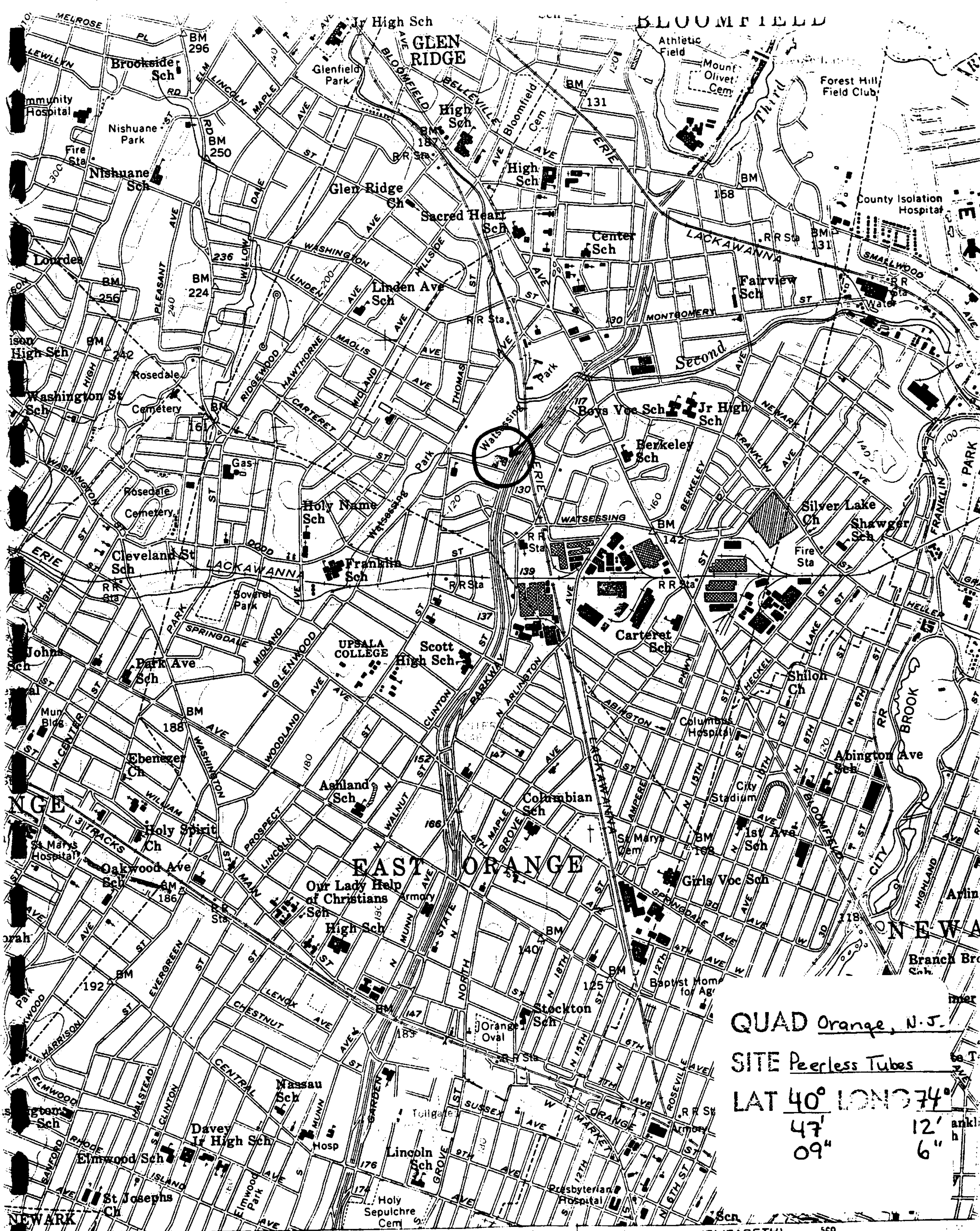
05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

V. SOURCES OF INFORMATION *(Cite specific references, e.g. state files, sample analysis, reports)*

Bloomfield Health Dept. files; NJDEP/DWM, DWR files; USEPA files : Attachments A-D

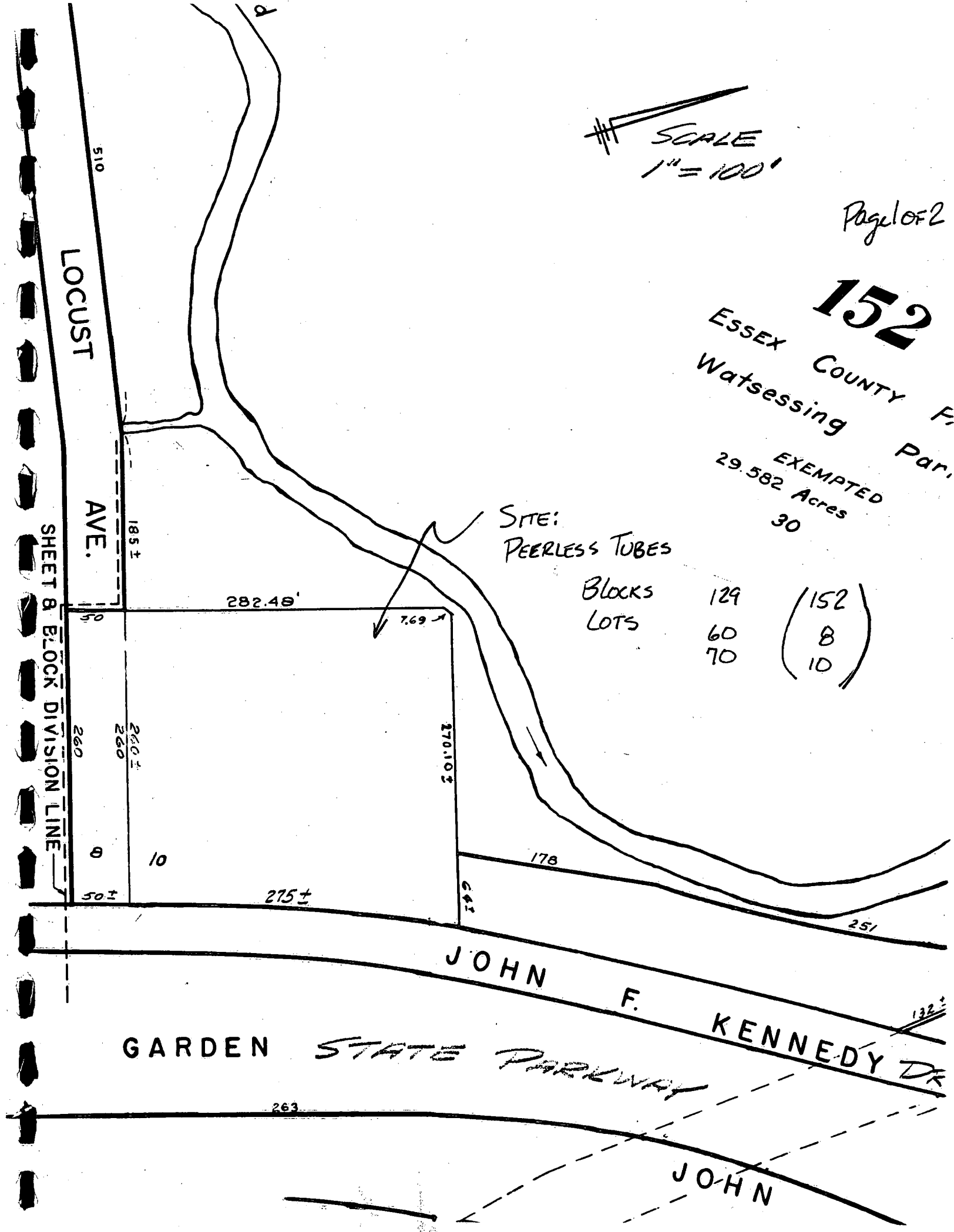


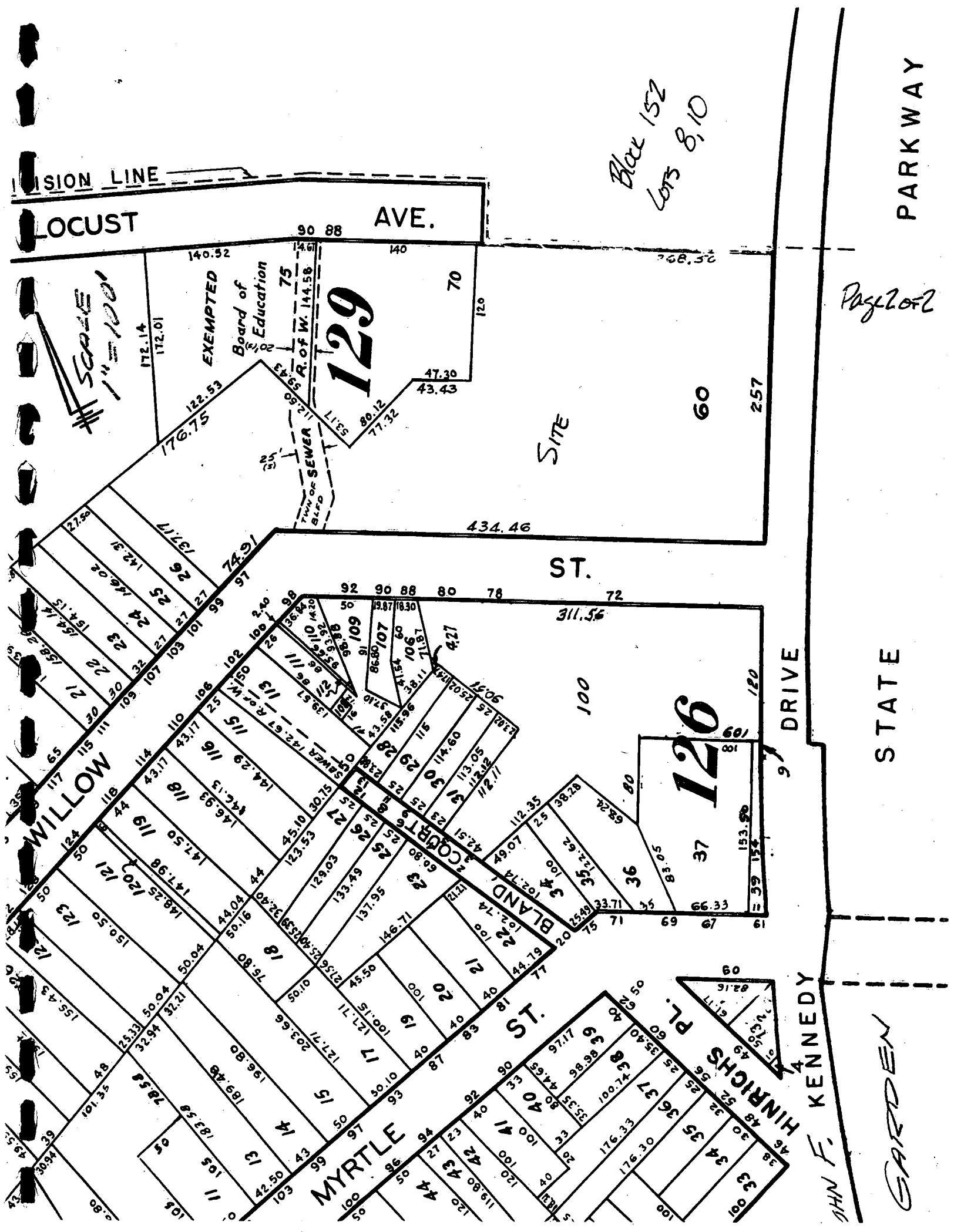
QUAD Orange, N.J.

SITE Peerless Tubes

LAT 40° 47' 09" LONG 74° 12' 6"

SCALE 1:24000


SCALE
1" = 100'
Page 1 of 2
152
ESSEX COUNTY P
Watsessing Par
EXEMPTED
29.582 Acres
30
SITE:
PEERLESS TUBES
BLOCKS 129 (152
LOTS 60 8
70 10)
LOCUST AVE.
510
185 ±
282.48'
50
7.69
260
260 ±
260
270.10 ±
SHEET 8 BLOCK DIVISION LINE
8
10
50 ±
275 ±
178
251
JOHN F. KENNEDY DR
132 ±
GARDEN STATE PARKWAY
263
JOHN


Block 152
Lots 8,10
PARKWAY
Page 2 of 2
SCALE 1" = 100'
EXEMPTED
Board of Education
129
R. of W.
SEWER
TWIN OF
BLVD
SITE
434.46
ST.
311.56
DRIVE
STATE
126
100
WILLOW
COURT
BLAND
MYRTLE
ST.
PL.
HINRICHS
KENNEDY
JOHN F.
GARDEN

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
METRO BUREAU OF REGIONAL ENFORCEMENT
2 BABCOCK PLACE
WEST ORANGE, NEW JERSEY 07052

JOHN W. GASTON JR., P.E.
DIRECTOR

DIRK C. HOFMAN, P.E.
DEPUTY DIRECTOR

March 7, 1986

Mr. Alan J. Ianuzzi, Project Engineer
Peerless Tube Company
58-76 Locust Avenue
Bloomfield, NJ 07003

Re: Compliance Evaluation Inspection
Peerless Tube Company
NJPDES No. NJ 0029335/NJ 0029327
Bloomfield/Essex County

Dear Mr. Ianuzzi:

A Compliance Evaluation Inspection of your facility was conducted by a representative of this Division on January 7, 1986.

Your facility received a rating of "ACCEPTABLE". A copy of the completed inspection report form is enclosed for your information. Please address any minor deficiencies noted therein.

This Division anticipates your continued cooperation in assisting us in the prevention and control of water pollution in New Jersey.

Very truly yours,

Richard White
Environmental Compliance
Investigator
Metro Bureau of
Regional Enforcement

A28:C35

cc: Dr. Richard A. Baker, USEPA
Mr. Paul Molinari, USEPA
Mr. Richard Proctor, H.O.

ATTACHMENT A-1

Enclosure

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
P.O. Box 2809 Trenton, N.J. 08625

DISCHARGE SURVEILLANCE REPORT

PERMIT #: NJ0029335 NO. OF DISCHARGES: 001, 002, 003 CLASS: MIN/INO

DISCHARGER: PEERLESS TUBE COMPANY

OWNER: SAME AS ABOVE

MUNIC: BLOOMFIELD COUNTY: ESSEX WATERSHED CODE: 8

LOCATION: 58-76 LOCUST AVENUE

RECEIVING WATERS: LLOYD'S + WIGWAM BROOK STREAM CLASS: FW-2

LIC. OPERATOR & PLANT CLASS: —

TRAINEE/ASST: — OTHER INFO: 201-743-5100 EXT 250

MAJOR DEFICIENCIES NOTED: NONE

OVERALL RATING: ☒ Acceptable ☐ Conditionally Acceptable ☐ Unacceptable

EVALUATOR: MICHAEL J. SIERONOCK TITLE: ENVIRONMENTAL COMPLIANCE INVESTIGATOR III

INFORMATION FURNISHED BY: (name) ALAN J. JANUZZI

(title) PROJECT ENGINEER (organization) PEERLESS TUBE COMPANY

DATE OF INSPECTION: JANUARY 7, 1986

ATTACHMENT A-2

Form DWR-053-A
4/78

N.J.D.E.P.
D.W.R.
DISCHARGE SURVEILLANCE REPORT

Permit #: NJ0029335
Date: 1/7/86

INDUSTRIAL TREATMENT PROCESS EVALUATION

RATING CODES: S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable

		RATING	COMMENTS
GENERAL	DISCHARGE # 001, 002, 003	---	
	WASTEWATER SOURCE(S)	---	NON CONTACT COOLING WATER
	CONTINUITY OF OPERATION	---	
	BYPASSES/OVERFLOWS	NA	
	S.P.C.C. PLAN	NA	
	ALARM SYSTEMS	NA	
	ALTERNATE POWER SUPPLY	NA	
TREATMENT PROCESSES			
SLUDGE HANDLING	WASTE OILS.		
	SOLVENTS.	S	GENERATOR # NJD002171122
	DISPOSAL SITE	S	SOLVENTS RECOVERY SERVICE OF N.J. LINDEN, N.J. NJD002185597
OTHER INFORMATION	FLOW METER & RECORDER	S	METERS
	RECORDS	S	
	SAMPLING PROCEDURES	S	PERSONNEL
	ANALYSES PERFORMED BY	S	GARDEN STATE LABS, IRVINGTON, NJ. # 07044
	FINAL EFFLUENT APPEARENCE	S	001, 003 NO DISCHARGE / 002 DISCHARGE
	REC. WATERS APPEARENCE	S	

ATTACHMENT A-3

Form DWR-053
3/81

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
CN 029, Trenton, N.J. 08625

DISCHARGE SURVEILLANCE REPORT

Permit # NJ0029335
Date 1/7/86

PLANT DIAGRAM AND FLOW SEQUENCE:

CITY WATER → N.C.C.W. A.C. → 001 (NO DISCHARGE)

CITY WATER → N.C.C.W. COMPRESSOR → 002

CITY WATER → N.C.C.W. → 003 (NO DISCHARGE)
1) DEGREASING TANK
2) COOLING JACKETS
3) RECOVERY UNIT
4) STILL

DISCHARGE DATA

SOURCE: 002 PERIOD: GRAB

DIS	PARA	SAMPLE TYPE	PERMIT LIMITS	DATA	DIS	PARA	SAMPLE TYPE	PERMIT LIMITS	DATA
001 003	TEMP	GRAB	30 / 86°F	—	001 003	Cu	GRAB	≤ 1.0 mg/l	—
"	pH	"	6.5-8.5	—	002	COD	GRAB	≤ 50 mg/l	< 5 mg/l
"	TSS	"	—	—	"	TSS	"	—	4.0 mg/l
"	COD	"	≤ 50 mg/l	—	"	TEMP	"	≤ ΔT (5°F) FROM AMBIENT ΔT₃ TO MAX 3°	—
"	PETRO HYDRO	"	≤ 10 mg/l	—	"	Cr	"	0.5 mg/l	.005 mg/l
"	Cr	"	≤ 0.5 mg/l	—	"	Zn	"	1.0 mg/l	.028 mg/l
"	Zn	"	≤ 1.0 mg/l	—	"	Cu	"	1.0 mg/l	.025 mg/l

~~MONITORING DEFICIENCIES~~: NO CORROSION INHIBITORS USED.

ATTACHMENT A-4

Form DWR-053
4/78

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
P.O. Box 2809 Trenton, N.J. 08625

DISCHARGE SURVEILLANCE REPORT

PERMIT #: NJ0029271 NO. OF DISCHARGES: 001 CLASS: MIN/INO

DISCHARGER: PEERLESS TUBE COMPANY

OWNER: SAME AS ABOVE

MUNIC: BLOOMFIELD COUNTY: ESSEX WATERSHED CODE: 8

LOCATION: 58-76 LOCUST AVENUE

RECEIVING WATERS: LLOYD'S + WIGWAM BROOK STREAM CLASS: FW-2

LIC. OPERATOR & PLANT CLASS: —

TRAINEE/ASST: — OTHER INFO: 201-743-5100 EXT 250

MAJOR DEFICIENCIES NOTED: NONE

OVERALL RATING: [X] Acceptable [ ] Conditionally Acceptable [ ] Unacceptable

EVALUATOR: MICHAEL J. PIETROWOCK TITLE: ENVIRONMENTAL COMPLIANCE INVESTIGATOR III

INFORMATION FURNISHED BY: (name) ALAN J. IANUZZI

(title) PROJECT ENGINEER (organization) PEERLESS TUBE COMPANY

DATE OF INSPECTION: JANUARY 7, 1986

ATTACHMENT A-5

N.J.D.E.P.
D.W.R.
DISCHARGE SURVEILLANCE REPORT

Permit #: NJ0029327
Date: 1/7/86

INDUSTRIAL TREATMENT PROCESS EVALUATION

RATING CODES: S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable

		RATING	COMMENTS
GENERAL	DISCHARGE # 001	---	
	WASTEWATER SOURCE(S)	---	NON CONTACT COOLING WATER
	CONTINUITY OF OPERATION	---	
	BYPASSES/OVERFLOWS	NA	
	S.P.C.C. PLAN	NA	
	ALARM SYSTEMS	NA	
	ALTERNATE POWER SUPPLY	NA	
TREATMENT PROCESSES			
		NA	
SLUDGE HANDLING	WASTE OILS	S	
	SOLVENTS		GENERATOR # NJD 002171122
	DISPOSAL SITE	S	SOLVENTS RECOVERY SERVICE OF N.J. LINDEN, N.J. NJD002182849
OTHER INFORMATION	FLOW METER & RECORDER	S	METERS
	RECORDS	S	
	SAMPLING PROCEDURES	S	PERSONNEL
	ANALYSES PERFORMED BY	S	GARDEN STATE LABS, IRVINGTON N.J. 07044
	FINAL EFFLUENT APPEARENCE	S	
	REC. WATERS APPEARENCE	S	

ATTACHMENT A-6

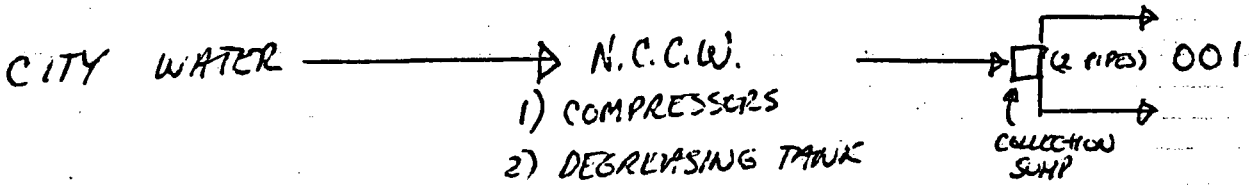
Form DWR-063
3/81

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
CN 029, Trenton, N.J. 08625

DISCHARGE SURVEILLANCE REPORT

Permit # NJ0029327
Date 1/7/86

PLANT DIAGRAM AND FLOW SEQUENCE:



DISCHARGE DATA

SOURCE: 001 PERIOD: GRAB

DIS	PARA	SAMPLE TYPE	PERMIT LIMITS	DATA	DIS	PARA	SAMPLE TYPE	PERMIT LIMITS	DATA
001	TEMP	GRAB	—	—	001	Cu	GRAB	1.0 mg/l	.011 mg/l
"	PH	"	6.5-8.5	—	"	BOD	"	—	—
"	TSS	"	—	2.0 mg/l					
"	COD	"	≤ 50 mg/l	11 mg/l					
"	PETRO HYDRO.	"	≤ 10 mg/l	< 1 mg/l					
"	Cr.	"	0.5 mg/l	< .005 mg/l					
"	Zn	"	1.0 mg/l	.023 mg/l					

MONITORING DEFICIENCIES: NONE

ATTACHMENT A-7

Draft

June 18, 1984

Mr. John Schierer, Personnel Director
Peerless Tube Company
58 Locust Avenue
Bloomfield, New Jersey 07003

Dear Mr. Schierer:

As you may recall, both verbally (on 2/23/84) and in writing (on 3/2/84) I requested from Peerless Tube Company six items of documentation concerning potential occupational health hazards in Department 9 (aerosol can manufacturing).

Although you have not responded personally to this request, I did receive a letter dated March 30, 1984, from Elwood J. Heerwagen, Jr., of Apruzzese & Mc Dermott Law Offices, representing Peerless Tube Company. Mr. Heerwagen stated that he had advised the company not to submit the information requested.

I think it is most unfortunate that Peerless has adopted this position, because potentially serious health hazards do exist in Department 9. As Mr. Ianuzzi knows, the aerosol can operation uses chlorinated and aromatic hydrocarbon solvents, some of which cause cancer. In addition, your workers are exposed to several glycol ethers, which may cause birth defects, male sterility, and other adverse reproductive effects. These compounds are absorbed through the skin as well as by inhalation.

I am also aware that in 1980 Peerless Tube Company was cited for 84 violations of the OSHA noise standard, and assessed a penalty of $1000. Additional safety violations from 1977-1980 resulted in close to $6000 in fines. Meter readings taken by my staff in February indicated sound levels ranging from 88-101 dBA, all above the OSHA level for a hearing conservation program.

I would very much like to continue our original joint efforts to quantify and reduce or eliminate these problems. I understand that you have received the necessary permits and are now installing a trichloroethylene reclaiming system; this may help reduce emissions into the work area. However, to evaluate your employees' health risk more completely, it will be necessary to conduct full-shift (8-hour) personal ~~sampling~~ monitoring, and to consider the types(s) of personal protective equipment in use.

ATTACHMENT B-1

Within the framework of voluntary cooperation, which I sincerely hope can be re-established, several options are available. For exapmle, The Essex County Occupational Health Program could continue to provide technical assistance, a request could be made for a Health Hazard Evaluation by NIOSH, or an outside consultant could be hired by the company.

On the other hand, non-cooperation could result in enforcement-type activities, or lawsuits by employees, especially those who are pregnant or trying to have children.

I would like to meet with you in my office to discuss these matters further. If you wish to bring along legal counsel I have no objection. Mr. Friedman of Essex County will also be asked to join us.

I look forward to hearing from you at your earliest convenience.

Very truly yours,

Richard B. Proctor
Director, Health & Human Services

~~RBP/dmz~~
cc: -Robert Friedman
~~-Industrial Hygienist~~
-complainants
-Elwood J. Heerwagen, Jr.

ATTACHMENT B-2

Summary of Air Sampling Results
Peerless Tube Company
February 23, 1984

Contaminant	No. of Samples	Range)ppm)	OSHA PEL's	ACGIH TLV's
C_5 - C_7 Alkanes	7	.08 - 1.1	500	50-500
Chlorinated Alkanes	9	.20 - 13	100-500	50-350
Aromatic Hydrocarbons	9	.27 - 2.2	100-200	25-100
Butyl Alcohol	8	.13 - .69	100	50
2- Ethoxyethyl Acetate (Cellosolve Acetate)	9	.23 - 1.1	100	5
2- Butoxyethanol (Butyl Cellosolve)	8	.45 - 1.8	50	25

TOTAL ORGANIC SOLVENTS	.70 - 19
Range of sampling times:	166 - 240 min.

ATTACHMENT B-3

COUNTY OF ESSEX
DEPARTMENT OF HEALTH AND REHABILITATION
DIVISION OF COMMUNITY HEALTH SERVICES

PETER SHAPIRO
COUNTY EXECUTIVE

520 BELLEVILLE AVENUE
CENTRAL BUILDING
BELLEVILLE, NEW JERSEY 07109
201 - 751 - 6630

MARTIN A. LIVENSTEIN
DIVISION DIRECTOR

June 18, 1984

I have enclosed five items which may be helpful to you:

1. NIOSH Current Intelligence Bulletin #39 (excerpts)
   This document explains some recently discovered hazards of glycol ethers, a group of widely used solvents. Some of these solvents are found in the lacquer and paint used by Peerless Tube Co. Most of the publication consists of technical information, but I have included and underlined those sections I think you will find relevant.

2. Material Safety Data Sheet (MSDS): H-852 (John Armitage & Company)
   Under Section II, Hazardous Ingredients, you will see that this product (the lacquer used by Peerless for interior coating) is composed of 43% glycol ethers, cellosolve and cellosolve acetate. The other ingredients are also toxic, but my sampling results showed them to be present only in very low amounts. I think most of the information on this sheet is self-explanatory.

3. Material Safety Data Sheet (MSDS): X66B Clear Topcoat, White Aerosol Coating (Isis Chemicals)
   As you can see, the Isis paints used by Peerless contain variable amounts of another glycol ether, butyl cellosolve. Although this MSDS is not as detailed as the other, the same precautions should apply.

4. NIOSH Health Hazard Evaluation (HHE) Program
   This packet contains Federal regulations governing HHE's. I have underlined key sections on the authority and procedures used by NIOSH, including their right to enter a workplace and the employee's right to confidentiality. If you can find two people to sign, I will help you fill out the form properly.

ATTACHMENT B-4

5. Summary of Air Sampling Results
If you go to the State Occupational Health Clinic in Trenton, bring this and the MSDS's with you.

In the meantime, the Bloomfield Health Officer (Rick Proctor) and I will try again to get the company to cooperate voluntarily. We are also planning to ask Federal OSHA to investigate the company's hearing conservation (noise control) program.

If you have any questions, don't hesitate to call.

Sincerely,

Bob Friedman

Robert Friedman
Industrial Hygienist

RF/dmz
enclosure (5)

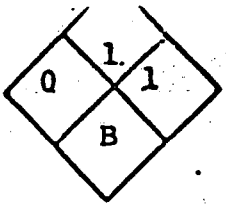
cc: -Rick Proctor
Health Officer

ATTACHMENT B-5

MATERIAL SAFETY DATA SHEET

FOR COATINGS, RESINS AND RELATED MATERIALS

(Approved by U.S. Department of Labor "Essentially Similar" to Form OSHA-20)



Section I

MANUFACTURER'S NAME: ISIS CHEMICALS, INC.

DATE OF PREP:

STREET ADDRESS: Viaduct Road

CITY, STATE, AND ZIP CODE: Stamford, CT 06907

EMERGENCY TELEPHONE NO.: (203) 324-7306

PRODUCT CLASS: Water Reducible Bake Enamel

INFORMATION TELEPHONE NO.: " "

MANUFACTURERS CODE IDENTIFICATION: LB-5906

TRADE NAME: X66B Clear Topcoat

Section II—HAZARDOUS INGREDIENTS

INGREDIENT	PERCENT	OCCUPATIONAL EXPOSURE LIMITS	VAPOR PRESSURE	TOXICITY DATA
(Butyl Cellosolve) Ethylene Glycol Mono Butyl Ether	16.6	25ppm	1.0	
utanol	4.2	50ppm	4.3	
Dimethyl Amino Ethanol	2.4	---	5.0	

Section III—PHYSICAL DATA

BOILING RANGE: 100-173°C

VAPOR DENSITY: ☒ HEAVIER, ☐ LIGHTER THAN AIR

EVAPORATION RATE: ☐ FASTER ☒ SLOWER, THAN ETHER

PERCENT VOLATILE BY VOLUME: 73.2 WEIGHT PER GALLON: 8.45

Section IV—FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASSIFICATION: OSHA Class III B / DOT Not Restricted

FLASH POINT: Indeterminate LEL: n/a

EXTINGUISHING MEDIA

☒ FOAM ☐ "ALCOHOL" FOAM ☐ CO_2 ☐ DRY CHEMICAL ☐ WATER FOG ☐ OTHER n/a

UNUSUAL FIRE AND EXPLOSION HAZARDS

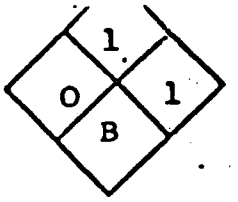
n/a

ATTACHMENT B-6

MATERIAL SAFETY DATA SHEET

FOR COATINGS, RESINS AND RELATED MATERIALS

(Approved by U.S. Department of Labor "Essentially Similar" to Form OSHA-20)



Section I

MANUFACTURER'S NAME: ISIS CHEMICALS, INC.

DATE OF PREP:

STREET ADDRESS: Viaduct Road

CITY, STATE, AND ZIP CODE: Stamford, CT 06907

EMERGENCY TELEPHONE NO.: (203) 324-7306

PRODUCT CLASS: Water Reducible Bake Enamel

INFORMATION TELEPHONE NO.: " " "

MANUFACTURER'S CODE IDENTIFICATION: S-510-99

TRADE NAME: X66B White Aerosol Coating

Section ii—HAZARDOUS INGREDIENTS

INGREDIENT	PERCENT	OCCUPATIONAL EXPOSURE LIMITS	VAPOR PRESSURE	TOXICITY DATA
Ethylene Glycol Mono Butyl Ether	8.9	25ppm	1.0	
Butanol	3.0	50ppm	4.3	
Dimethyl Amino Ethanol	1.5	-----	5.0	

Section III—PHYSICAL DATA

BOILING RANGE: 100-173OC

VAPOR DENSITY: ☒HEAVIER, ☐LIGHTER THAN AIR

EVAPORATION RATE: ☐FASTER ☒SLOWER, THAN ETHER

PERCENT VOLATILE BY VOLUME: 67.4

WEIGHT PER GALLON: 10.26

Section IV—FIRE AND EXPLOSION HAZARD DATA

FLAMMABILITY CLASSIFICATION: OSHA Class IIIB; DOT Not Restricted

FLASH POINT: Indeterminate

LEL: N/A

EXTINGUISHING MEDIA

☐FOAM ☐"ALCOHOL" FOAM ☐CO_2 ☐DRY CHEMICAL ☐WATER FOG ☐OTHER N/A

UNUSUAL FIRE AND EXPLOSION HAZARDS

N/A

ATTACHMENT B-7

Section V — HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: 50 ppm as Butyl Cellosolve

EFFECTS OF OVEREXPOSURE: Headache, nausea, dizziness and vomiting may result from breathing or from absorption through skin. Eyes are irritated by the li Vapors may be irritating to breath.

EMERGENCY AND FIRST AID PROCEDURES: If inhaled, remove to fresh air. Call a physician. case of contact with skin or eyes, immediately flush with plenty of wate Get medical care for eyes

Section VI — REACTIVITY DATA

STABILITY ☐ UNSTABLE ☒ STABLE CONDITIONS TO AVOID

INCOMPATABILITY (*Materials to avoid*)

HAZARDOUS DECOMPOSITION PRODUCTS: Burning may produce carbon monoxide and/or carbon dio

HAZARDOUS POLYMERIZATION ☐ MAY OCCUR ☒ WILL NOT OCCUR

CONDITIONS TO AVOID

Section VII — SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Flush with large volumes of water

WASTE DISPOSAL METHOD: Dispose in accordance with local, state and Federal regul

Section VIII — SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: All purpose canister mask.

VENTILATION

PROTECTIVE GLOVES: Rubber

EYE PROTECTION: Goggles or face shield

OTHER PROTECTIVE EQUIPMENT: Eye bath and safety shower

Section IX — SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Store away from heat and flame.

OTHER PRECAUTIONS

ATTACHMENT B-8

MATERIAL SAFETY DATA SHEET: H-852

DATE OF PREPARATION: Sept. 12, 1982

********** SECTION I **********

JOHN L. ARMITAGE & COMPANY
245 THOMAS STREET, NEWARK, N.J. 07114 201-344-1000

PRODUCT CLASS: Epoxy-Phenolic
MANUFACTURERS CODE IDENTIFICATION: H-852
TRADE NAME: Not applicable.

********** SECTION II, HAZARDOUS INGREDIENTS **********

INGREDIENT	PERCENT	TLV	LEL	VAPOR PRESSURE
Cellosolve Acetate *	20-30	100 ppm	1.8%	2.0 mm Hg
Cellosolve Solvent *	13-23	200 ppm	1.8%	4.0 mm Hg
Toluol	8-18	200 ppm	1.2%	38.0 mm Hg
Ethanol	5-15	1000 ppm	4.3%	44.0 mm Hg
Xylol	< 5	100 ppm	1.0%	5.1 mm Hg
Phosphoric Acid	< 5	1 mg/m3		

* Reproductive and blood disorders and birth defects have been observed in tests on laboratory animals.

********** SECTION III **********

BOILING RANGE: 173-313 F
VAPOR DENSITY: Heavier than air.
EVAPORATION RATE: Slower than Ether.
PERCENT VOLATILE BY VOLUME: 77
WEIGHT PER GALLON: 8.22

********** SECTION IV, FIRE AND EXPLOSION HAZARD DATA **********

DOT CATEGORY: Red label, flammable liquid. FLASH POINT: Less than 100F
LEL: See SECTION II.

EXTINGUISHING MEDIA:

Use National Fireprotection Association (NFPA) CLASS B extinguishers (carbon dioxide, dry chemical or foam) designed to extinguish NFPA CLASS IB liquid fires.

UNUSUAL FIRE AND EXPLOSION HAZARDS:

Keep containers tightly closed. Isolate from heat, electrical equipment, sparks and open flame. Closed containers may explode when exposed to extreme heat. Do not apply to hot surfaces.

SPECIAL FIRE FIGHTING PROCEDURES:

Water spray may be ineffective. Water may be used to prevent pressure build-up and possible autoignition or explosion when exposed to extreme heat. If water is used, fog nozzles are preferable.

ATTACHMENT B-9

********** SECTION V, HEALTH HAZARD DATA **********

THRESHOLD LIMIT VALUE: See SECTION II, SECTION VI.
EFFECTS OF OVEREXPOSURE:
ACUTE:

Ingestion may cause nausea, vomiting, diarrhea.
Inhalation of vapor may cause headaches, dizziness, confusion, nausea, unconsciousness or coma.
Skin absorption may cause irritation and may result in systemic illness.
Eye contact may cause irritation, redness, tearing and blurred vision.

CHRONIC:

The effects of excessive, chronic exposures to this product have not been fully investigated. Repeated handling or use may present additional hazards. Exercise due care.

EMERGENCY AND FIRST AID PROCEDURE:

If swallowed, call physician immediately.
If overcome by vapor, remove from exposure and call physician. If breathing is irregular or stopped, start resuscitation, administer oxygen.
If splashed on skin or clothing, remove clothing and wash skin with soap and water.
If splashed into eyes, flush with water and consult physician.

********** SECTION VI, REACTIVITY DATA **********

STABILITY: Stable.
CONDITIONS TO AVOID: Not applicable.

INCOMPATIBILITY: Strong oxidizing agents.
HAZARDOUS DECOMPOSITION PRODUCTS: Oxides of Carbon, toxic fumes.

HAZARDOUS POLYMERIZATION: Will not occur.
CONDITIONS TO AVOID: Not applicable.

********** SECTION VII, SPILL OR LEAK PROCEDURES **********

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

Remove all sources of ignition. Avoid breathing vapors. Ventilate area. Remove with inert absorbent and non-sparking tools.

WASTE DISPOSAL METHOD:

Dispose in accordance with local, state and federal regulations.

ATTACHMENT B-10

********** SECTION VIII, SPECIAL PROTECTION INFORMATION **********

RESPIRATOR PROTECTION:

In outdoor or open areas use Bureau of Mines approved mechanical filter respirator to remove solid air borne particles of overspray during spray application.
In restricted ventilation areas use Bureau of Mines approved chemical-mechanical filters designed to remove a combination of particulate and gas and vapor.
In confined areas use Bureau of Mines approved air line type respirators or hoods.

VENTILATION:

Provide general dilution or local exhaust ventilation in volume and pattern to keep TLV of most hazardous ingredient in SECTION II below acceptable limit, LEL in SECTION II below stated limit, and to remove decomposition products during baking, welding or flame cutting of parts coated with this product.

PROTECTIVE GLOVES:

Required for prolonged or repeated contact.

EYE PROTECTION:

Use safety eyewear designed to protect against splash of liquid.

OTHER PROTECTIVE EQUIPMENT:

Prevent prolonged skin contact to contaminated clothing.

********** SECTION IX, SPECIAL PRECAUTIONS **********

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING:

Do not store above 120F. Store large quantities in buildings designed and protected for storage of NFPA CLASS I flammable liquids.

OTHER PRECAUTIONS:

Do not take internally. Containers should be grounded when pouring. Avoid free fall of liquid in excess of a few inches. Do not flame cut, braze or weld without Bureau of Mines approved ventilation. Add label warning.
Higher levels of vapors are released during baking of parts coated with this product. Provide adequate exhaust ventilation to prevent release of these vapors into work areas.

ATTACHMENT B-11

CURRENT INTELLIGENCE BULLETIN #39

THE GLYCOL ETHERS, WITH PARTICULAR REFERENCE TO 2-METHOXYETHANOL AND 2-ETHOXYETHANOL: Evidence of Adverse Reproductive Effects

May 2, 1983

The National Institute for Occupational Safety and Health (NIOSH) recommends that 2-methoxyethanol (2ME) and 2-ethoxyethanol (2EE) be regarded in the workplace as having the potential to cause adverse reproductive effects in male and female workers. These recommendations are based on the results of several recent studies that have demonstrated dose-related embryotoxicity and other reproductive effects in several species of animals exposed by different routes of administration. Of particular concern are those studies in which exposure of pregnant animals to concentrations of 2ME or 2EE at or below their respective Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits (PEL's) led to increased incidences of embryonic death, teratogenesis, or growth retardation. Exposure of male animals resulted in testicular atrophy and sterility. In each case the animals had been exposed to 2ME or 2EE at concentrations at or below their respective Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits (PEL's). Therefore, appropriate controls should be instituted to minimize worker exposure to both compounds. NIOSH suggests that producers, distributors, and users of 2ME and 2EE, and of substances and materials containing 2ME and 2EE, give this information to their workers and customers, and that professional and trade associations and unions inform their members.

embryonic death = miscarriage
teratogenesis = birth defect

BACKGROUND

Physical and Chemical Properties

The glycol ethers 2-methoxyethanol (2ME) and 2-ethoxyethanol (2EE) are part of a family of ethylene glycol ethers. At room temperature and atmospheric pressure, 2ME and 2EE are colorless liquids. Both compounds are completely miscible with water and with many organic solvents. Both are highly reactive in the presence of strong oxidizers; 2ME is also highly reactive in the presence of strong bases [1,2]. Identifiers and synonyms for 2ME and 2EE are listed in Appendix II.

ATTACHMENT B-12

EGdiME orally administered on days 7-10 gestation caused embryonic death and was teratogenic in mice [31]. Preliminary data showed maternal death upon dermal application of 1.4 ml per day of 2BE to rats during gestation [27]. The same preliminary investigation found no significant excess embryonic death upon dermal application of 0.48 ml per day of 2BE or 1.4 ml per day of 2EEE to rats during gestation; final results await skeletal and visceral evaluation [27]. Microscopic evaluation revealed atrophy of the seminiferous tubules in one of five mice orally dosed with 2BE or 2PE [18]. Inhalation exposure to bis2ME caused temporary infertility in rats and abnormal spermhead morphology in mice [32]. No testicular effects were observed following short-term 1MP exposure as were observed from 2ME exposure in the same investigation [20].

CONCLUSIONS AND RECOMMENDATIONS

2ME and 2EE have caused significant increases of adverse reproductive effects in experimental animals of both sexes. 2ME was teratogenic and embryotoxic when administered to pregnant mice, rats, and rabbits. In non-pregnant female animals, 2ME caused no changes in reproductive organs that were discernible either grossly or microscopically. A single study indicated that the fertility of female rats was not affected by 2ME exposure. In male animals, exposure to 2ME resulted in testicular atrophy, histopathological testicular changes, infertility, and abnormal spermhead morphology. 2EE caused similar reproductive effects in animals. 2EE was teratogenic and embryotoxic when administered to pregnant rats and rabbits. In non-pregnant female rats, exposure to 2EE did not affect fertility, but it did produce varying degrees of toxicity in pregnant rabbits and rats. In males, 2EE produced testicular atrophy in mice and microscopic testicular changes in mice, rats, and dogs.

Adverse reproductive effects in both male and female animals have been reported at concentrations that ranged from less than to four times the OSHA PEL for 2ME or 2EE. Of particular concern are the changes observed below the OSHA PEL's. Reproductive effects have been observed in both male and female animals exposed to 2ME at concentrations lower than those causing abnormal blood effects (low WBC counts). Although humans and animals may differ in their susceptibility to specific chemical compounds, any substance that produces adverse reproductive effects in animals should be considered to have the potential to cause similar reproductive effects in humans. This concern is highlighted by the fact that these effects have been observed in several species of animals exposed by various routes. As described above, exposure to 2ME has been associated with encephalopathy and pancytopenia in humans who had significant skin contact with this solvent. A desire to protect workers from such blood disturbances formed the basis, in part, for the current OSHA PEL's.

Based on these recent findings, as well as continued concern for adverse effects after percutaneous absorption, NIOSH recommends that 2ME and 2EE be regarded in the workplace as having the potential to cause adverse

ATTACHMENT B-13

reproductive effects in male and female workers and embryotoxic effects, including teratogenesis, in the offspring of the exposed, pregnant female.

Although there have been animal studies conducted at concentrations at which these effects did not occur, we cannot assume that these are safe concentrations for humans. By decreasing exposure the potential for adverse reproductive and embryotoxic effects will decrease.

Even though reproductive and embryotoxic risks have not been determined for workers exposed to 2ME and 2EE at their respective OSHA PEL's, NIOSH believes that these standards should be reexamined. The adverse reproductive and embryotoxic potentials of 2ME and 2EE were not known when OSHA adopted these standards to protect workers against other acute and chronic effects.

NIOSH urges employers to voluntarily assess how their workers may be exposed to 2ME and 2EE and to reduce exposure to the lowest extent possible. The voluntary lowering of industrial exposure guides for 2ME and 2EE by some chemical manufacturers is commendable. The "Guidelines for Minimizing Worker Exposure to 2-Methoxyethanol and 2-Ethoxyethanol," Appendix I, should be adapted to specific work situations.

As previously discussed, concern also extends to structurally related glycol ethers that have not been tested adequately to assess fully their potential for causing reproductive effects. Preliminary test results of some structurally related glycol ethers indicate that they also have the potential for causing adverse reproductive effects similar to 2ME and 2EE. In light of these findings, NIOSH recommends similar cautions be exercised to reduce worker exposure to these structurally related glycol ethers until adequate testing demonstrates their safety.

For J. Donald Millar, M.D.
Assistant Surgeon General
Director, National Institute for
Occupational Safety and Health

ATTACHMENT B-14

Product Substitution

The substitution of an alternative material with a lower potential health risk is an important method for reducing exposure. Extreme care must be used when selecting substitutes. Although the test results for some structurally related glycol ethers reported in this bulletin seem to suggest less hazardous compounds, the testing is not yet sufficient to identify a substitute for 2ME and 2EE. Possible health effects and potential exposures of alternatives to 2ME and 2EE should be fully evaluated prior to selection.

Contaminant Controls

Airborne concentrations of 2ME and 2EE can be most effectively controlled at the source of contamination by enclosure of the operation and use of local exhaust ventilation. Guidelines for selected processes and operations can be found in NIOSH's Recommended Industrial Ventilation Guidelines [36]. When enclosing a process or operation, a slight vacuum should be used to create negative pressure so that leakage will cause external air to flow into the enclosure and minimize contamination of the workplace. This can be accomplished with a well-designed local exhaust ventilation system that physically encloses the process as much as possible, with sufficient capture velocity to keep the contaminant from entering the workplace atmosphere. The design of ventilation systems should take into account the reactive characteristics qf 2ME and 2EE.

Ventilation equipment should be checked at least every three months to ensure adequate performance. System effectiveness should also be checked soon after any change in production, process, or control that might result in significant increases in airborne exposure to 2ME and 2EE.

Worker Isolation

If feasible, workers may be isolated from direct contact with the work environment by the use of automated equipment operated from a closed control booth or room. The control room should be maintained at a greater air pressure than that surrounding the process equipment so that air flows out of, rather than into, the room. This type of control will not protect workers who must perform process checks, adjustments, maintenance, and related operations. Therefore, special precautions are often necessary to prevent or limit worker exposure in these situations and frequently involve the use of personal protective equipment.

Personal Protective Equipment

Personal protective equipment, which may include goggles, gloves, coveralls, footwear, and respirators, should not be the only means of preventing or minimizing exposure during routine operations. Since 2ME and 2EE can penetrate the skin, personal protective clothing and equipment should be selected that is impermeable to 2ME and 2EE.

ATTACHMENT B-15

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
CN 029
TRENTON, NEW JERSEY 08625

JOHN W. GASTON JR., P.E.
DIRECTOR

DIRK C. HOFMAN, P.E.
DEPUTY DIRECTOR

February 22, 1985

Mr. Alan Iannuzzi, Project Engineer
Peerless Tube Company
58-76 Locust Avenue
Bloomfield, NJ 07003

Re: Compliance Evaluation Inspection
Peerless Tube Company
NJPDES No. NJ 0029335 and
NJPDES No. NJ 0029327
Bloomfield/Essex County

Dear Permittee:

A Compliance Evaluation Inspection of your facility was conducted by a representative of this Division on January 10, 1985.

Your facility received a rating of "ACCEPTABLE". A copy of the completed inspection report form is enclosed for your information. Please address any minor deficiencies noted therein.

This Division anticipates your continued cooperation in assisting us in the prevention and control of water pollution in New Jersey.

Very truly yours,

Joseph Bogen

Joseph S. Bogen
Environmental Compliance Investigator
Metro Region
Enforcement Element

A25:G25

cc: Dr. Richard A. Baker, USEPA
Mr. Paul Molinari, USEPA
Mr. Richard Proctor, H.O.

Enclosure

ATTACHMENT C-1

Form DWR-053
178

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
P.O. Box 2809 Trenton, N.J. 08625

DISCHARGE SURVEILLANCE REPORT

PERMIT #: NJ0029335 NO. OF DISCHARGES: 002 CLASS: MINLIC

DISCHARGER: PEERLESS TUBE

OWNER: SAME AS ABOVE

MUNIC: BLOOMFIELD COUNTY: ESSEX WATERSHED CODE: P

LOCATION: 58-76 LOCUST AVENUE

RECEIVING WATERS: 1 LOYDS WIGWAM BROOK/PASSAIC RIVER STREAM CLASS: FW-2

LIC. OPERATOR & PLANT CLASS:

TRAINEE/ASST: OTHER INFO:

MAJOR DEFICIENCIES NOTED: NONE

OVERALL RATING: [X] Acceptable [ ] Conditionally Acceptable [ ] Unacceptable

EVALUATOR: JOSEPH ROGEN TITLE: COMPLIANCE INVESTIGATOR

INFORMATION FURNISHED BY: (name) ALAN V DANIZI

(title) PROJECT ENGINEER (organization) PEERLESS TUBE

DATE OF INSPECTION: 1/10/85

ATTACHMENT C-2

DWR-053-A

N.J.D.E.P.
D.W.R.
DISCHARGE SURVEILLANCE REPORT

Permit #: NJ0029335
Date: 1/10/85

INDUSTRIAL TREATMENT PROCESS EVALUATION

RATING CODES: S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable

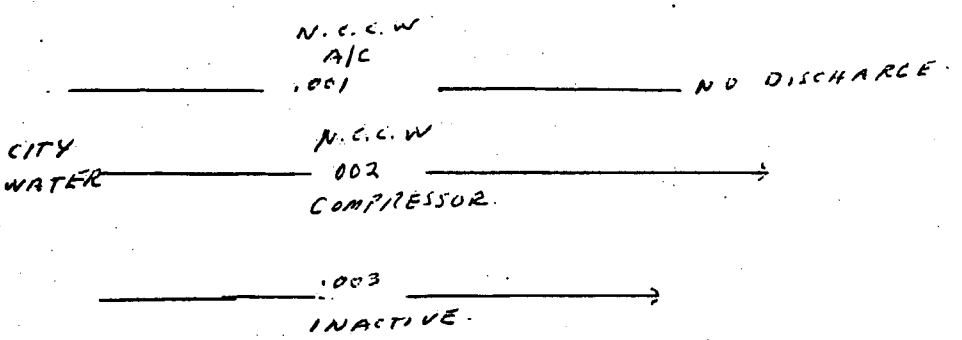
		RATING	COMMENTS
GENERAL	DISCHARGE # 002	---	W.C.L.W. COMPRESSOR (001 A/C SEASONAL)
	WASTEWATER SOURCE(S)	---	(003 INACTIVE)
	CONTINUITY OF OPERATION	---	
	BYPASSES/OVERFLOWS	NA	
	S.P.C.C. PLAN	NA	NATURAL GAS
	ALARM SYSTEMS	NA	
	ALTERNATE POWER SUPPLY	NA	
TREATMENT PROCESSES			
		NA	PROCESS WATER TO SANITARY
SLUDGE HANDLING		NA	
			HAZARDOUS WASTE GENERATOR NJDCL1712200 2
	DISPOSAL SITE	S	& COLD SEAL SOLVENTS
OTHER INFORMATION	FLOW METER & RECORDER	S	CALCULATED 002 FLOW
	RECORDS	S	
	SAMPLING PROCEDURES	S	
	ANALYSES PERFORMED BY	C	GARDEN STATE LAB'S, KEARNEY N.J.
	FINAL EFFLUENT APPEARENCE	S	CLEAR.
	REC. WATERS APPEARENCE	S	

ATTACHMENT C-3

N.J.D.E.P.
D.W.R.
DISCHARGE SURVEILLANCE REPORT

Permit #: NJ 0029335
Date: 1/10/85

PLANT DIAGRAM AND FLOW SEQUENCE:



DMR 1/4/84 - 9/30/84 ΔT 1.6°C.

SAMPLING PERIOD: _____ COMPOSITE INTERVAL: _____

GRAB

DISCHG	PARA	SAMPLE TYPE	PERMIT LIMITS	SAMPLE RESULT	DISCHG	PARA	SAMPLE TYPE	PERMIT LIMITS	SAMPLE RESULT
001	TEMP	GRAB	≤ΔT (5°) FROM AMBIENT ATS TO MAX. 30°C.	20°C					
001	PH	GRAB	6 8.5	8.1					
001	TSS	GRAB	-	7					
001	COD	GRAB	≤ 50 mg/L	20					
001	PET HYDRO CARBONS	GRAB	≤ 10 mg/L	<1					

ATTACHMENT C-4

m VST-001
81

STATE OF NEW JERSEY
Department of Environmental Protection
Water Analysis

CHAIN OF CUSTODY

BACT. LAB NO. _____
DATE REC'D. _____
BOTTLE NO. 21238
DATE REC'D. _____
STORET ENT. _____ READ _____

PLEASE TYPE OR PRINT WITH BALLPOINT PEN

MUNICIPALITY	COUNTY	STREAM
BLOOMFIELD	ESSEX	
FACILITY	LOCATION	
PEERLESS TUBE	3 LOCUST AVE	
REPRESENTATIVE	TITLE	COLL NAME
		BOGEN 221
REMARKS	1 9 D	NJ 002 9355
AT TAP LLOYDS BROOK	001 - ~~OLO~~	

Station Identification Number: S C , _____ | YR. MO. DAY: 850110 | HOUR: 1145 (1) | P 8 , 21238

FIELD ANALYSIS

- [x] Water Temp. °C. (2) P00010, 20
- [ ] D.O. - Winkler (3) P00300,
- [ ] D.O. - Probe (4) P00299,
- [ ] pH (Field) (5) P00400,
- [ ] Sample Depth-ft. (6) P00003,
- [ ] Stream Flow-CFS (7) P00061,
- [ ] Gage Height-ft. (8) P00065,
- [ ] Spec. Cond. @ 25 °C (9) P00095,
- [ ] Salinity °/00 (10) P00480,
- [ ] Tide Stage (11) P70211,

CONDITION CODES

- [ ] Weather Conditions (12) P00041,
- [ ] Flow Severity (13) P01351,
- [ ] _____ Severity (14) P013_ _,
- [ ] _____ Severity (15) P013_ _,

NUTRIENTS

LEVEL [ ] HIGH [ ] LOW

- [ ] NO_2 - N (16) P00615,
- [ ] $NO_2 + NO_3$ - N (17) P00630,
- [ ] NH_3 - N (18) P00610,
- [ ] Tot. Kjeldahl N (19) P00625,
- [ ] Ortho - PO_4 as P (20) P70507, / PO_4 (21) P00660,
- [ ] Phosphorus - tot as P (22) P00665, / PO_4 (23) P00650,

BACTERIOLOGICAL – DILUTIONS (REQUESTED)

	10	1	-1 10	-2 10	-3 10	-4 10	-5 10	-6 10
Fecal Coliform / Total Coliform								
Fecal Streptococci								

- [ ] Fecal coli #100 ml: [ ] MPN (24) P31615, [ ] MF (25) P31613,
- [ ] Fecal Strept MPN/100ml (26) P31677,
- [ ] Tot coli MPN/100 ml (27) P31505,

BIOCHEMICAL OXYGEN DEMAND

INITIAL D.O. (lab.) _____ SAMPLE

SEED YES [ ] NO [ ]

CONC. % | BOD _____

- [ ] BOD 5-DAY (28) P310, 6-DAY (29) P312,

- [ ] COD (30) P340, 20
- [ ] TOC (31) P00680,

- [ ] Color Pt - Cou (32) P00080,
- [ ] Turbidity (33) P00076, 10
- [x] Suspended Solids (34) P00530, ~~20~~ 7
- [ ] Suspended Solids Ash (35) P00540,
- [ ] Tot. Solids (36) P00500,
- [ ] Tot. Solids - Ash (37) P00510,
- [ ] Tot. Dissolved Solids (TDS) (38) P70300,

- [x] pH (LAB) (39) P00403, 8.1
- [ ] Alkalinity as $CaCO_3$ (40) P00410,
- [ ] Min. Acidity as $CaCO_3$ (41) P00436,
- [x] Chloride (42) P00940, 14
- [ ] MBAS (43) P38260,
- [ ] Phenols (44) P32730,
- [ ] Hardness - tot as $CaCO_3$ (45) P00900,
- [ ] Sulfate (46) P00945,
- [ ] Oil & Grease (47) P00556,
- [x] Petroleum Hydrocarbons (48) P45501, 1K
- [ ] Cyanide (49) P00720,

- [ ] As - tot ug/l (50) P01002,
- [ ] Cd - tot ug/l (51) P01027,
- [ ] Cr - tot ug/l (52) P01034,
- [ ] Cu - tot ug/l (53) P01042,
- [ ] Fe - tot ug/l (54) P01045,
- [ ] Hg - tot ug/l (55) P71900,
- [ ] Mn - tot ug/l (56) P01055,
- [ ] Ni - tot ug/l (57) P01067,
- [ ] Pb - tot ug/l (58) P01051,
- [ ] Zn - tot ug/l (59) P01092,

RECEIVED
FEB 06 1985
DEP'T. ENVIRON. PROT.
NEWARK OFFICE

ADDITIONAL ANALYSIS

- [ ] _____ P _____,
- [ ] _____ P _____,
- [ ] _____ P _____,
- [ ] _____ P _____,
- [ ] _____ P _____,

REPORT SUBMITTED

RESULTS mg/l unless otherwise noted

JAN 31 1985

Chemist Review _____

NJDOH Environmental Chemistry Laboratory

Part 1 (White) - Water Quality Inventory Copy
Part 2 (Canary) - Laboratory Copy
Part 3 (Pink) - Laboratory Copy
Part 4 (Goldenrod) - Field Samplers Copy

ATTACHMENT C-5

DEP- 009

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
TRENTON, NEW JERSEY 08625

CHAIN OF CUSTODY RECORD

NAME OF UNIT AND ADDRESS:

PEERLESS TUBE
53 LOCUST AVE
BLOOMFIELD N.J -

SAMPLE NUMBER	Number of Containers	DESCRIPTION OF SAMPLES
21239	4	1 PH 1 COD 1 TSS CHLORIDE 1 PET HYDROCARBONS
21238	4	1 PH 1 COD 1 TSS CHLORIDE 1 PET HYDROCARBONS

RECEIVED
FEB 08 1985
DEPT. ENVIRONMENTAL PROTECTION
NEWARK OFFICE

PERSON ASSUMING RESPONSIBILITY FOR SAMPLE: J. BOCEN — TIME 1145 AM — DATE 1/10/85

SAMPLE NUMBER	RELINQUISHED BY:	RECEIVED BY:	TIME	DATE	REASON FOR CHANGE OF CUSTODY
21239	J. BOCEN	J.F. Walk	1513	1/10/85	DO
21238	J. BOCEN	J.F. Walk	1513	1/10/85	DO
21238,39	J.F. Walk	Nancy Mann	1530	1/10/85	pH
		Chris Langan	900	1/11/85	Petroleum Hydrocarbons
	J.F. Walk	Chris Langan	900	1/11/85	Chloride
	A. Ward	M. DeFatta	1130	1/11/85	COD
	A. Ward	[illegible]	1330	1/11/85	TSS

REPORT SUBMITTED
JAN 31 1985
NJDOH Environmental
Chemistry Laboratory

ATTACHMENT C-6

rm DWR-053
/78

EP

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
P.O. Box 2809 Trenton, N.J. 08625

DISCHARGE SURVEILLANCE REPORT

PERMIT #: NJ0029327 NO. OF DISCHARGES: 001 CLASS: MIN/IND

DISCHARGER: PEERLESS TUBE COMPANY

OWNER: SAME AS ABOVE

MUNIC: BLOOMFIELD COUNTY: ESSEX WATERSHED CODE: P

LOCATION: 58-76 LOCUST AVE

RECEIVING WATERS: WIGWAM BROOK & PASSAIC RIVER STREAM CLASS: FW-2

LIC. OPERATOR & PLANT CLASS:

TRAINEE/ASST: OTHER INFO:

MAJOR DEFICIENCIES NOTED:

SEE INSPECTION REPORT

OVERALL RATING: [X] Acceptable [ ] Conditionally Acceptable [ ] Unacceptable

EVALUATOR: JOSEPH BOGEN TITLE: COMPLIANCE INVESTIGATOR

INFORMATION FURNISHED BY: (name) ALAN IANUZZI

(title) PROJECT ENGINEER (organization) PEERLESS TUBE COMPANY

DATE OF INSPECTION: 1/10/85

ATTACHMENT C-7

N.J.D.E.P.
D.W.R.
DISCHARGE SURVEILLANCE REPORT

Permit #: NJ0029327
Date: 1/10/85

INDUSTRIAL TREATMENT PROCESS EVALUATION

RATING CODES: S = Satisfactory M = Marginal U = Unsatisfactory NA = Not Applicable

		RATING	COMMENTS
GENERAL	DISCHARGE # 001 *	---	001* W.C.C.W COMPRESSOR - COOLING
	WASTEWATER SOURCE(S)	---	COLLARS
	CONTINUITY OF OPERATION	---	CITY WATER CONTINUOUS
	BYPASSES/OVERFLOWS	NA	
	S.P.C.C. PLAN	NA	NATURAL GAS
	ALARM SYSTEMS	NA	
	ALTERNATE POWER SUPPLY	NA	
TREATMENT PROCESSES			
		NA	PROCESS WATER TO SANITARY
SLUDGE HANDLING			
		NA	
			HAZARDOUS WASTE GENERATOR
	DISPOSAL SITE	S	
OTHER INFORMATION	FLOW METER & RECORDER	S	CALCULATE FLOW
	RECORDS	S	
	SAMPLING PROCEDURES	S	
	ANALYSES PERFORMED BY	S	GARDEN STATE LABS - IRVINGTON N.J
			*NOTE: PERMIT INDICATES (1) DISCHARGE PIPE: FACILITY HAS (2) DISCHARGING INTO WIGWAM BROOK. DYE TESTED, SAME COOLING WATER
			NOTE P.D 8.6 EXCEEDS LIMIT (8.5)
	FINAL EFFLUENT APPEARENCE	S	CLEAR
	REC. WATERS APPEARENCE	S	

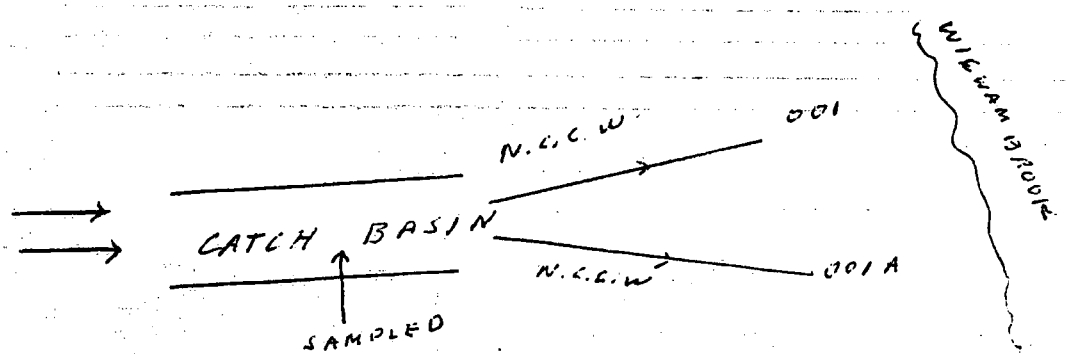
ATTACHMENT C-8

NR-053

N.J.D.E.P.
D.W.R.
DISCHARGE SURVEILLANCE REPORT

Permit #: NJ 0024341
Date: 1/16/85

PLANT DIAGRAM AND FLOW SEQUENCE:



N.C.C.W. - 001 + 001A SAME N.C.C.W.

SAMPLING PERIOD: _____ COMPOSITE INTERVAL: GRAB

DMR 12/18/84 ΔT 2°F

DISCHG	PARA	SAMPLE TYPE	PERMIT LIMITS	SAMPLE RESULT
001	TEMP	GRAB	≤ ΔT (5°F) FROM AMBIENT NO ΔT ≥ 30°C	30°C
001	PH	GRAB	6 - 8.5	8.6
001	TSS	GRAB	-	2
001	COD	GRAB	≤ 50 mg/L	25
001	PET HYDRO CARBONS	GRAB	≤ 10 mg/L	< 1

DISCHG	PARA	SAMPLE TYPE	PERMIT LIMITS	SAMPLE RESULT

ATTACHMENT C-9

Form VST-001
7/81

STATE OF NEW JERSEY
Department of Environmental Protection
Water Analysis

CHAIN OF CUSTODY

BACT. LAB NO. ____
DATE REC'D. ____
BOTTLE NO. 21239
DATE REC'D. ____
STORET ENT. ____ READ ____

PLEASE TYPE OR PRINT WITH BALLPOINT PEN

MUNICIPALITY BLOOMFIELD	COUNTY ESSEX	STREAM
FACILITY PEERLESS TUBE	LOCATION 332 LOCUST AVE	
REPRESENTATIVE	TITLE	COLL NAME BOGEN 221
REMARKS AT JUNCTION BOX 1 OD		
2 DISCHARGE PIPES SAME N.J.S.W.		

Station Identification Number: S C, [ ]

YR. MO. DAY: 8 5 0 1 1 0

HOUR: 1 1 4 5

(1) P 8, Sample No. 21239

FIELD ANALYSIS

☐ Water Temp. °C.	(2) P00010,	3 0
☐ D.O. - Winkler	(3) P00300,	
☐ D.O. - Probe	(4) P00299,	
☐ pH (Field)	(5) P00400,	
☐ Sample Depth-ft.	(6) P00003,	
☐ Stream Flow-CFS	(7) P00061,	
☐ Gage Height-ft.	(8) P00065,	
☐ Spec. Cond. @ 25°C	(9) P00095,	
☐ Salinity °/00	(10) P00480,	
☐ Tide Stage	(11) P70211,	

BACTERIOLOGICAL – DILUTIONS (REQUESTED)

	10	1	-1 10	-2 10	-3 10	-4 10	-5 10	-6 10
Fecal Coliform								
Total Coliform								
Fecal Streptococci								

Fecal coli #100 ml ☐ MPN (24) P31615, ☐ MF (25) P31613,

☐ Fecal Strept MPN/100ml (26) P31677,

☐ Tot coli MPN/100 ml (27) P31505,

BIOCHEMICAL OXYGEN DEMAND

INITIAL D.O. (lab.) ____ SAMPLE

SEED YES ☐ NO ☐

CONC. % ____ BOD ____

☐ BOD 5-DAY (28) P310, 6-DAY (29) P312,

☑ pH (LAB)	(39) P00403,	8.6
☐ Alkalinity as $CaCO_3$	(40) P00410,	
☐ Min. Acidity as $CaCO_3$	(41) P00436,	
☑ Chloride	(42) P00940,	16
☐ MBAS	(43) P38260,	
☐ Phenols	(44) P32730,	
☐ Hardness - tot as $CaCO_3$	(45) P00900,	
☐ Sulfate	(46) P00945,	
☐ Oil & Grease	(47) P00556,	
☑ Petroleum Hydrocarbons	(48) P45501,	1K
☐ Cyanide	(49) P00720,	

CONDITION CODES

☐ Weather Conditions	(12) P00041,	
☐ Flow Severity	(13) P01351,	
☐ ____ Severity	(14) P013__,	
☐ ____ Severity	(15) P013__,	

☑ COD	(30) P340,	25
☐ TOC	(31) P00680,	

☐ As - tot ug/l	(50) P01002,	
☐ Cd - tot ug/l	(51) P01027,	
☐ Cr - tot ug/l	(52) P01034,	
☐ Cu - tot ug/l	(53) P01042,	
☐ Fe - tot ug/l	(54) P01045,	
☐ Pb - tot ug/l	(58) P01051,	
☐ Zn - tot ug/l	(59) P01092,	

RECEIVED
FEB 06 1985
DEPT. ENVIRON. PROTECTION
NEWARK OFFICE

NUTRIENTS

LEVEL ☐ HIGH ☐ LOW

☐ NO_2 - N	(16) P00615,	
☐ $NO_2 + NO_3$ - N	(17) P00630,	
☐ NH_3 - N	(18) P00610,	
☐ Tot. Kjeldahl N	(19) P00625,	

Ortho - P as PO_4 ☐	(20) P70507,	
☐	(21) P00660,	
Phosphorus - tot as P PO_4 ☐	(22) P00665,	
☐	(23) P00650,	

☐ Color Pt - Co	(32) P00080,	
☐ Turbidity	(33) P00076,	
☑ Suspended Solids	(34) P00530,	2
☐ Suspended Solids Ash	(35) P00540,	
☐ Tot. Solids	(36) P00500,	
☐ Tot. Solids - Ash	(37) P00510,	
☐ Tot. Dissolved Solids (TDS)	(38) P70300,	

ADDITIONAL ANALYSIS

☐ ____ P____
☐ ____ P____
☐ ____ P____
☐ ____ P____
☐ ____ P____

REPORT SUBMITTED
JAN 31 1985

RESULTS mg/l unless otherwise noted

Chemist Review ____

NJDOH Environmental Chemistry Laboratory

Part 1 (White) - Water Quality Inventory Copy
Part 2 (Canary) - Laboratory Copy
Part 3 (Pink) - Laboratory Copy
Part 4 (Goldenrod) - Field Samplers Copy

ATTACHMENT C-10

State of New Jersey

JOHN W. GASTON JR., P.E.
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
CN 029
TRENTON, NEW JERSEY 08625

DIRK C. HOFMAN, P.E.
DEPUTY DIRECTOR

February 10, 1984

Mr. Alan J. Ianuzzi
Project Engineer
Peerless Tube Company
58-76 Locust Street
Bloomfield, NJ 07003

Re: Compliance Evaluation Inspection
Perless Tube Company
NJPDES Nos. NJ 0029335 & NJ 0029327
Bloomfield/Essex County

Dear Mr. Ianuzzi:

A Compliance Monitoring Inspection of your facility was conducted by a representative of this Division on January 5, 1984.

Your facility received a rating of "ACCEPTABLE". A copy of the completed inspection report form is enclosed for your information. Please address any minor deficiencies noted therein.

This Division anticipates your continued cooperation in assisting us in the prevention and control of water pollution in New Jersey.

Very truly yours,

Kevin T. Aiello

Kevin T. Aiello
Environmental Compliance Investigator
Metro Region
Enforcement Element

A12:G25

cc: USEPA
Richard Proctor, Health Officer

Enclosure

ATTACHMENT C-11

Form VHW-001 (5/82)

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Please TYPE all information.

HAZARDOUS WASTE MANIFEST

PART A - GENERATOR'S COPY

DOCUMENT NO. NJ 0184794

GENERATOR NAME Peerless Tube Co.	PHONE (INCLUDE AREA CODE) 201-743-5100	EPA ID NO. NJD002171122
ADDRESS (STREET - CITY - STATE) 58 Locust Ave., Bloomfield, N.J.		ZIP CODE 07003
TRANSPORTER NO. 1 Continental Carriers	PHONE (INCLUDE AREA CODE) 201-727-1188	EPA ID NO. NJD059072058
ADDRESS (STREET - CITY - STATE) 504 Raritan Rd., Sayerville, N.J.		ZIP CODE 08859
TRANSPORTER NO. 2	PHONE (INCLUDE AREA CODE)	EPA ID NO.
ADDRESS (STREET - CITY - STATE)		ZIP CODE
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY Solvents Recovery Service	PHONE (INCLUDE AREA CODE) 201-862-2000	EPA ID NO. NJD002182897
SITE ADDRESS (STREET - CITY - STATE) 1200 Sylvan St., Linden, N.J.		ZIP CODE 07036

IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE
THIS FORM IS NO. ____ OF A TOTAL OF ____. THE FIRST MANIFEST DOCUMENT NO. IS NJ →

	PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN NUMBER	FORM	NET QUANTITY	UNITS	CONTAINERS NO.	CONTAINERS TYPE	EPA HAZ CODE	EPA WASTE TYPE
1.	Waste, Paint Sludge	Flammable Liquid	UN1263	4	3850	1	70	01	I	0006
2.	Waste, Oil N.O.S.	Combustable	UN1270	1	330	1	06	01	I	0001
3.										
4.										
5.										
6.										

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, marked and labelled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA and the State. The wastes described above were consigned to the Transporter named. The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE - ALSO PRINT SIGNATURE	TITLE	DATE SHIPPED (MO. DAY YR.)	EXPECTED ARRIVAL DATE (MO. DAY YR.)
E. Van Winkle Ed Van Winkle	Buyer	01 04 84	01 04 84

TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT - ALSO PRINT SIGNATURE	TRANSPORTER NO. 1 VEHICLE ID NO.	DATE RECEIVED (MO. DAY YR.)
M T Downey M T Downey	NJSWAS577AA	01 04 84

TEAR AT THIS PERFORATION

ATTACHMENT

07-02-11

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

MEMO

TO Vince Krisak

FROM Bruce Comfort

DATE Aug 8 1985

SUBJECT Case Review and Referral 85-5-17-5C

Please be advised that I have reviewed the attached case file and am forwarding same for your review and referral to the appropriate Bureau or Region.

This file constitutes a:

Recommendation for Case Closure
Directive Letter Referral
Notice of Violation Referral
Out of Region Case Referral
3.11 Procedure Referral

Other: _____

closed 8/15/85 VK

dg
Attachment

ATTACHMENT D-1

ADM-012

MEMO

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO Spill File

FROM Frank Gagliano through Bruce Comfort DATE August 6, 1985

SUBJECT Peerless Tube Company, Locust Street, Bloomfield, Essex County
DWM #85-05-17-05C - SP 07-02

Conclusion:

The report of deliberate dumping of thinners into a pit behind the subject facility could not be substantiated by inspections conducted by two separate officials.

Recommendations:

Due to the lack of substantial evidence, it is recommended that this case be closed.

FOC5:dg

ATTACHMENT D-2

ADM-012

MEMO NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO Spill File

FROM Frank Gagliano through Bruce Comfort DATE August 6, 1985

SUBJECT Peerless Tube Company, Locust Street, Bloomfield, Essex County
DWM #85-05-17-05C - SP 07-02

An initial inspection was conducted at the subject facility on July 11, 1985. The original report described the dumping of thinners and lacquers into a pit behind the plant.

When I arrived on site, I called Richard Proctor of the Bloomfield Health Department. He was not available and I left a message that I would be inspecting the Peerless facility. On May 17, 1985, Mr. Proctor inspected the facility and was unable to find the site of the reported dumping.

My inspection revealed that the plant is located in a residential urban area. The building itself is of brick construction and surrounded by paved parking lots and streets. A careful inspection of these areas did not reveal any evidence of dumping, nor could I find anything that could be construed as a "pit" as described in the original report.

FOC5:dg

ATTACHMENT D-3

Form VSC-005
6/82

361 4050

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT

A#19

INCIDENT REPORT

D.W.M. ASSIGNED CASE NUMBER	HOT LINE	INDEXED
85-05-17-0850	☐	☐

DATE	TIME (Military)	D.W.M. ID NO.
85-05-17	1330	2195

INCIDENT REPORTED BY:

NAME	PHONE
THOMAS SOLECKI	(212) 264-5130

AFFILIATION	CODE
FEDERAL ENV. PROT AGENCY	☐

STREET
26 FED PLAZA RM 1023

CITY	STATE	ZIP CODE
NEW YORK	NY	10278

INCIDENT LOCATION:

NAME	PHONE
FEERLESS TUBE COMPANY	

STREET	UTM VERT	UTM HORIZ
58-76 LOCUST AVE		

CITY	COUNTY	STATE	ZIP CODE
BLOOMFIELD	0709	NJ	

SOURCE OF SPILLED AND/OR DISCHARGED SUBSTANCE: Confirmed ☐ Alleged ☐ More Than 1 Source ☐

COMPANY NAME	PHONE
FEERLESS TUBE COMPANY	(201) 743-5100

CONTACT	TITLE
RICHARD POTTS	VICE PRESIDENT

STREET	DEP COMPANY NO.
58-76 LOCOST ST	

CITY	COUNTY	STATE	ZIP CODE
BLOOMFIELD	ESSEX	NJ	07003

SUSPECTED SPILLED AND/OR DISCHARGED SUBSTANCE: Confirmed ☑ Alleged ☐ More Than 2 Substances ☐

1. THINNERS			SUBSTANCE NO.
AMOUNT SPILLED: UNK	UNITS: GAL	A/P/E:	S/L/G/M:

2. LAQUERS			SUBSTANCE NO.
AMOUNT SPILLED: UNK	UNITS: GAL	A/P/E:	S/L/G/M:

DATE OF INCIDENT	TIME (Military)	TEMP.	WEATHER	WIND (Dir. & Vel.)
04-28-85	1640	50	CLEAR	VARI

SPILL ORIGIN: BEHIND PLANT INTO PIT.	CODE
CAUSE: DELIBERATE	CODE
WATER BODY AFFECTED	CODE
ASSOCIATED FIRE AND/OR HAZARDS	

INCIDENT REFERRED TO:

AGENCY	PHONE
CONTACT	AGENCY CODE

PRIMARY D.W.M. INVESTIGATOR: E2211 5/20/85	FOLLOWUP: ☐
NO FURTHER ACTION: 1	DATE: -- - -- - --

COMMENTS:

RECIEVED CALL FROM USEPA (NY) THAT A MR JEREMIAH FROM OSHA (201) 361-4045 OBSERVED THE MANAGMENT AND PERSONNEL FROM FEERLESS TUBE DELIBERATELY DUMP LAQUERS AND THINNERS INTO A PIT BEHIND THEIR PLANT. CALLED BLOOMFIELD HEALTH DEPT SPOKE TO

ATTACHMENT D-4

Form DWM-001
6/82

NEW JE[illegible]EY DEPARTMENT OF ENVIRONMENTAL[illegible]OTECTION
DIVISION OF WASTE MANAGEMENT

D.W.M. ASSIGNED CASE NUMBER 85-05-17-05		Page 2 of ___
DATE 85-05-17	TIME 1330	D.W.M. ID NO. 2175

RICHARD PROCTOR (201) 743-4400 AND ADVISED HIM OF THE SITUATION. THEY WILL RESPOND RECIEVED CALL FROM R. PROCTOR THAT THEY COULD NOT FIND SOURCE OF CONTAMINATION 2175

ATTACHMENT D-5

Peerless Tubes

File

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE:

SUBJECT: Possible Violation of RCRA Referral No. 7-85

FROM: Fred N. Rubel, Chief
Response and Prevention Branch

TO: Richard M. Walka, Chief
Solid Waste Branch

Attached is information indicating a possible violation of RCRA at the following location:

Facility: PEERLESS Tube Co.

Location: 59-76 LOCUST AVE
BLOOMFIELD, ~~NJ~~ NJ

The attached is submitted for your evaluation.

Attachment

EPA Form 1320-6 (Rev. 3-76)

ATTACHMENT D-6

USEPA REGION II INCIDENT NOTIFICATION FORM

EPA LOG No. 496-85
STATE LOG No.
RECORDED BY:
DATE: 4/26/85
TIME: 16:40

ed thru NRC

USCG COTP:

1. REPORTED BY: MR JEREMIAS (Name) OSHA (Organization)
ADDRESS: (Box or Street) PHONE: 361-4050
DOVER FIELD OFFICE (City) (State) (ZIP)

2. RESPONSIBLE PARTY: NOTIFIED FED. GOV. YES/NO (CIRCLE)
Name
Box or Street
City State ZIP Phone - -

3. SPILL LOCATION: PEERLESS TUBE CO
58-76 LOWST AVE
City BLOOMFIELD County ESSEX State NJ ZIP

4. OCCURRED: M|D|Y / / Time REPORTED: M|D|Y / / Time

5. MEDIA AFFECTED:
☑ Water: Name UNKNOWN Tributary to UNKNOW
☐ Groundwater ☐ Air ☑ Soil OTHER:

6. Pollutant ☐ Oil ☐ Designated Hazardous Substance ☑ Other LACQUERS & PAINTS

Material	Released (lbs./gal.)	RQ

7. RESPONSIBILITY: EPA ☑ USCG ☐ OTHER ☐

8. CAUSE: INTENTIONAL DUMPING

9. CLEAN UP: State ☐ Discharger ☐ 311(k) ☐ CERCLA ☐ Local Gov. ☐
Mitigation Taken:

10. COMMENTS: ON "ERN SIDE" OF WAREHOUSE LACQUERS & PAINTS ARE DUMPED INTO "PIT" WHICH SEEPS TO STORM-STORM SEWER

11. RRT: Activated And Assembled ☐ Not Activated ☐ Phone Activated ☐
12. EPA RESPONSE: On-Scene ☐ Phone Monitored ☐ TAT Response: On-Scene ☐
13. USCG Response ☐ Local Response ☐ State Response ☐
14. REFERRED TO: NPDES ☐ AIR ☐ TSCA ☐ RCRA ☑ Site Assessment ☐
CWA Spill 308 Spill Letter ☐ 308 SPCC Letter ☐ OTHER ☐
15. STATE NOTIFIED: YES ___ NO ___ WHO/WHEN:

ATTACHMENT D-7

(APRIL 1985)

MALCOLM PIRNIE

NJDEP Preliminary Assessments

Site Number: 3/6

TELEPHONE CALL CONFIRMATION

Local 743-4400 Long Distance _____ Date 4/21/86

To/From Richard Proctor Time 10 am

Bloomfield Health Dept. Project Prel. Assess

MPI Name Teresa Kennel Proj. No. 835-08-1100

Subject: Peerless Tubes Company

Was informed by Mr. Proctor that they have had problems with noise levels and ventilation at the Peerless Tube plant. Said to call Mr. Martin Jeremias of OSHA for further info

Route to:

File:

MALCOLM PIRNIE

NJDEP Preliminary Assessments

Site Number: 316

TELEPHONE CALL CONFIRMATION

Local 361-4050 Long Distance _____ Date 4/21/86

To/From Martin Jeremias Time 10 AM

OSHA Project Prel. Assess

MPI Name Teresa Kennel Proj. No. 835-08-1100

Subject: Peerless Tube Company

There is no more recent information available for health hazards (occupational) at Peerless, since OSHA returns to a site 3 years after an inspection - latest info is from 1984.

Route to:

File:

MALCOLM PIRNIE

OFF – SITE RECONNAISSANCE

Date: 4/23/86 Time In 11:20 AM Out 11:35 AM

Site ID No. 316

Site Name: Peerless Tubes

Location: Locust Avenue, just off Garden State Pkwy.

Address: 58-76 Locust Avenue

City, County Bloomfield, Essex Zip: 07003

Personnel: _____ Title: _____

_____ _____

_____ _____

_____ _____

Conditions: Snowy, Rainy, Cold Temperature: 40°

Any evidence of imminent hazard? No Illegal Dumping? No

Uncapped Monitoring Wells? No If Yes, Notify NJDEP

Signature: Teresa M. Kennel Date: 4/23/86

Witness: _____ Date: _____

MALCOLM PIRNIE

FIELD NOTES

Site: Peerless Tubes Site ID No. 316

Date: 4/23/86

The site consists of two buildings, directly across from each other on Locust Ave. The building located in the South-Eastern corner of Watessing Park, is less than 50 feet from Wigwam Brook.

Many trucks were loading and unloading at the site, and a stack of drums were found near one of the loading platforms. These drums were neatly stacked, and there was no evidence of any hazardous conditions at the site. There was, however, a strong odor present at the site, possibly of plastics.

Signature: Teresa M. Kennel Date: 4/23/86

Witness: Date:

MALCOLM PIRNIE

PHOTO LOG

Subject: Peerless Tube — Site ID No. 316

Date: 4/23/86 — Page No.

ASA: 100

Frame No:	Object photographed:*	Location of photographer:*	Compass heading:
1	Side of building on North side of Locust Ave. and Front of building on South side of Locust Ave. Also, part of Watsessing Park.	In Watsessing Park	South
2	Rear of building on North side of Locust Ave.	In Watsessing Park	East
3	Front of building on South Side of Locust Ave.	On Locust Avenue	Southeast
4	Truck Entrance / Loading Area and Stacks of drums at building on South side of Locust Ave.	On Locust Avenue	South

*Indicate on sketch or map if possible

Signature: Teresa M. Kennel — Date: 4/23/86

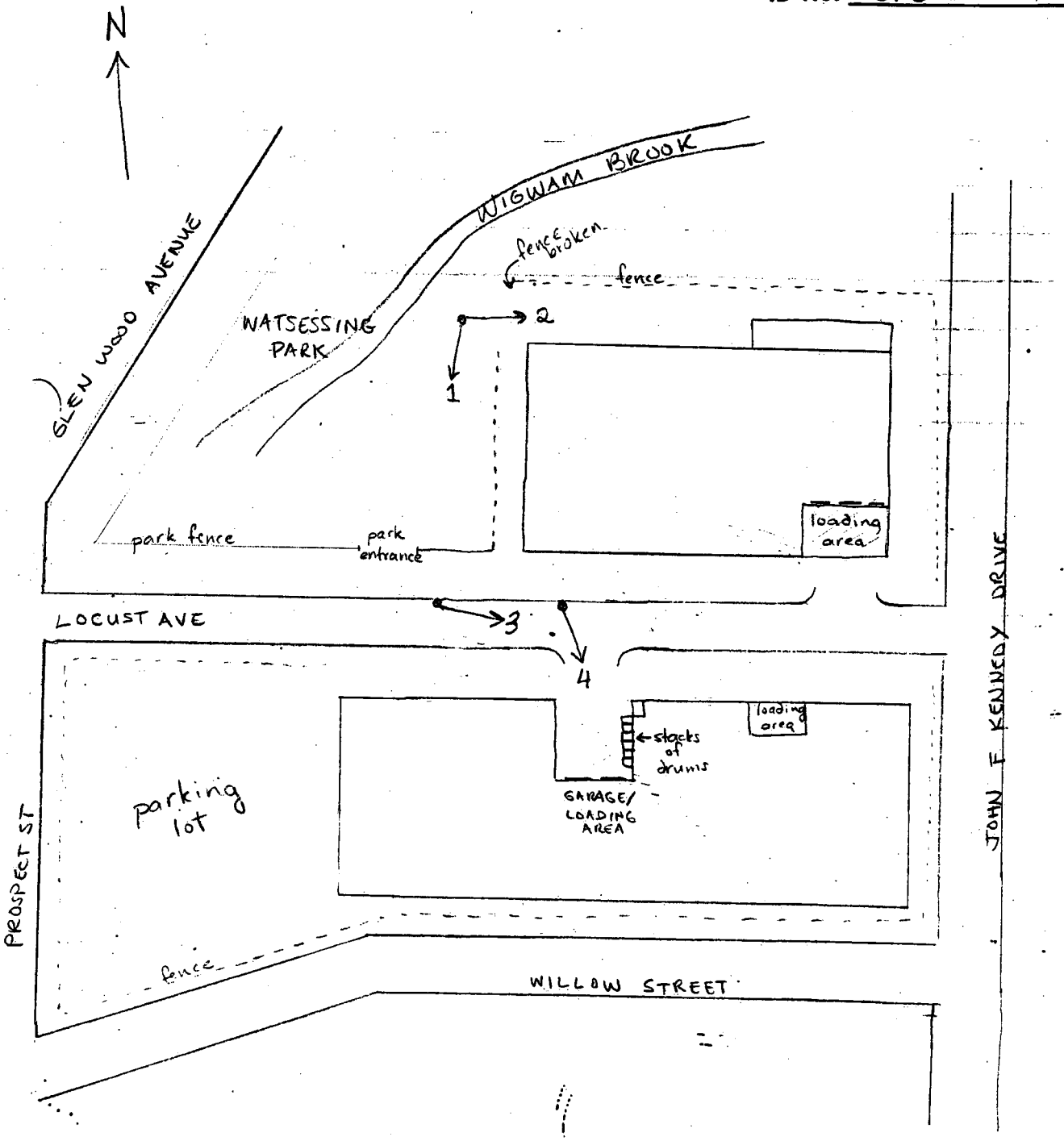
Witness: — Date:

MALCOLM PIRNIE

MAPS AND SKETCHES

Site: Peerless Tube

ID No. 316



Signature: Teresa M. Kennel

Date: 4/23/86

Witness: _____

Date: _____

NJDEP PRELIMINARY ASSESSMENTS

MARCH TO JUNE, 1986

FILE REVIEW SUMMARY

Site Name: PEERLESS TUBES

Site Number: 316

	SEARCH DATE	REVIEWED BY	STATUS*
New Jersey Department of Environmental Protection:			
Central Files:			
DWM	3-21-86	BLK/JDM	
DWR	3-24-86	BLK/JDM	X
HSMA	3-26-86	BLK/JDM	
Environmental Qual.	3-26-86	BLK/JDM	
Office of Sci. & Res.	3-26-86	BLK/JDM	
Field Office: METRO			
DWM	3-19-86	JDM	X
DWR	3-19-86	BLK	X
Env. Qual.			
U.S. Environmental Protection Agency:			
Edison	4-28-86	JRC	X
Federal Plaza			
Local Health Offices:			
Bloomfield	4-4-86	BLK	

Notes:

* An 'X' indicates information was retrieved from file, a blank line indicates no information was found.

MALCOLM PIRNIE

SITE NAME: Peerless Tubes

ID NO: 316 Essex

LOCATION: Bloomfield

FILE	SEARCH DATE	REVIEWER	RCRA 3001 FORM	CERCLA 103C FORM	PRELIMINARY INSP. REPORT	FIELD INSPECTION REPORTS	AGENCY INTERNAL MEMOS	RESP. PARTY CORRESPONDENCE	FORMAL REPORTING DOCUMENTS	SITE SKETCHES	ANALYTICAL DATA	SECOND SEARCH DATE	REMARKS	QA CHECK
SPILL EPA	4/28/86	JRC					✓							

CODES:

- ✓ REVIEWED AND COPIED
- X REVIEWED BUT NOT COPIED
- NF NOT FOUND
- NA NOT APPROPRIATE

MALCOLM PIRNIE

SITE NAME: Peerless Tube

ID NO: 316

LOCATION: Essex

FILE	SEARCH DATE	REVIEWER	RCRA 3001 FORM	CERCLA 103C FORM	PRELIMINARY INSP. REPORT	FIELD INSPECTION REPORTS	AGENCY INTERNAL MEMOS	RESP. PARTY CORRESPONDENCE	FORMAL REPORTING DOCUMENTS	SITE SKETCHES	ANALYTICAL DATA	SECOND SEARCH DATE	REMARKS	QA CHECK
Metro-Dum	3/19/86	JDM	NF	NF	NF	✓	✓	NF	✓	NF	NF			

CODES:

✓ REVIEWED AND COPIED
X REVIEWED BUT NOT COPIED
NF NOT FOUND
NA NOT APPROPRIATE

MALCOLM PIRNIE

SITE NAME: Peerless Tube Co.

ID NO: 316 Essex

LOCATION: Bloomfield

FILE	SEARCH DATE	REVIEWER	RCRA 3001 FORM	CERCLA 103C FORM	PRELIMINARY INSP. REPORT	FIELD INSPECTION REPORTS	AGENCY INTERNAL MEMOS	RESP. PARTY CORRESPONDENCE	FORMAL REPORTING DOCUMENTS	SITE SKETCHES	ANALYTICAL DATA	SECOND SEARCH DATE	REMARKS	QA CHECK
Metro-Dwr	3/19/86	BLK						✓		✓			13 copies, Peerless Tube File	

CODES:

✓ REVIEWED AND COPIED
X REVIEWED BUT NOT COPIED
NF NOT FOUND
NA NOT APPROPRIATE

MALCOLM PIRNIE

SITE NAME: Peerless Tubes

ID NO: 316 Essex

LOCATION: Bloomfield

FILE	SEARCH DATE	REVIEWER	RCRA 3001 FORM	CERCLA 103C FORM	PRELIMINARY INSP. REPORT	FIELD INSPECTION REPORTS	AGENCY INTERNAL MEMOS	RESP. PARTY CORRESPONDENCE	FORMAL REPORTING DOCUMENTS	SITE SKETCHES	ANALYTICAL DATA	SECOND SEARCH DATE	REMARKS	QA CHECK
Bloomfield Health Dept.	4/21/86	BLK	NA	NA	NF	✓	✓	NF	✓	NF	✓		Spoke with Gloria Shorter (Health Officer) and Richard Sorice (Plumbing Inspector). DEP is currently investigating spill in area, may have been caused by Peerless.	

CODES:

- ✓ REVIEWED AND COPIED
- X REVIEWED BUT NOT COPIED
- NF NOT FOUND
- NA NOT APPROPRIATE

MALCOLM PIRNIE

SITE NAME: Peerless Tubes

ID NO: 316

LOCATION: ESSEX

FILE	SEARCH DATE	REVIEWER	RCRA 3001 FORM	CERCLA 103C FORM	PRELIMINARY INSP. REPORT	FIELD INSPECTION REPORTS	AGENCY INTERNAL MEMOS	RESP. PARTY CORRESPONDENCE	FORMAL REPORTING DOCUMENTS	SITE SKETCHES	ANALYTICAL DATA	SECOND SEARCH DATE	REMARKS	QA CHECK
Central - DWR	3/26/86	JDM								✓				

CODES:

✓ REVIEWED AND COPIED

X REVIEWED BUT NOT COPIED

NF NOT FOUND

MALCOLM PIRNIE

Preliminary Assessment Photo Log

SITE: Peerless Tube

I.D. 316
4/23/86

FRAME: 1 TIME: 11:30 Am DIRECTION: South

DESCRIPTION: View from Watsessing Park, of side of building on North side of Locust Ave and front of building on South side of Locust Ave.

FRAME: 2 TIME: 11:30 Am DIRECTION: East

DESCRIPTION: Rear of building on North side of Locust Avenue.

MALCOLM PIRNIE

Preliminary Assessment Photo Log

SITE: Peerless Tube

I.D. 316

4/23/86

FRAME: 3 TIME: 11:30 Am DIRECTION: Southeast

DESCRIPTION: Front of building located on South side of Locust Avenue.

FRAME: 4 TIME: 11:30 Am DIRECTION: South

DESCRIPTION: Truck Entrance / Loading Area and Stacks of drums at